

AO 91 (Rev. 11/11) Criminal Complaint

FELONY

United States Courts Southern

UNITED STATES DISTRICT COURT

District of Texas

for the
Southern District of Texas

FILED

May 27, 2021

United States of America)

Nathan Ochsner, Clerk of Court

V.)

Case No. B-21-MJ-575

Ian FIGUEROA CISNEROS)

Defendant(s))

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/27/2021 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Sections 841(a)(1) & 846	knowingly and intentionally possessed and conspired to possess with others known and yet unknown, with the intent to distribute approximately 3.5 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

On May 27, 2021, at approximately 9:19 AM, Ian FIGUEROA CISNEROS entered the United States from Mexico via the motor vehicle lane at the Los Indios International Port-of-Entry in Brownsville, Texas while operating a black BMW sedan. A probable cause traffic stop was later conducted by the Brownsville Police Department on the black BMW with FIGUEROA CISNEROS as the driver and sole occupant near the 2900 block of North Expressway 77/ Interstate 69, Brownsville, Texas.

During a consent to search of the vehicle, Officers discovered three bundles wrapped in aluminum tape in a inside a plastic bag on the floorboard of vehicle. The bundles contained a white powdery substance which field tested positive for the properties of cocaine with a total weight of approximately 3.5 kilograms. During a custodial post-Miranda interview, FIGUEROA CISNEROS admitted to knowingly and intentionally transporting illegal narcotics from Mexico into the United States three times, including this occasion, for financial gain and provided a verbal statement detailing the events of his offense.



Continued on the attached sheet.



Complainant's Signature

Mark A. Worland Special Agent

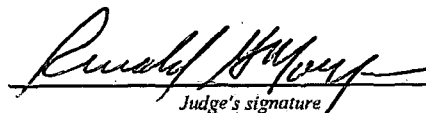
Printed name and title

May 27, 2021

Date

Brownsville, Texas

City and State



Judge's signature

Ronald G. Morgan U.S. Magistrate Judge

Printed name and title

Submitted by reliable electronic means, sworn to, and signature attested to telephonically pursuant to Fed.R.Crim.4.1 on 05/27/2021.